



RECEIVED
FSIS DOCKET ROOM

98 NOV 25 AM 7:36

Center for Innovative Food Technology

A Division of EISC

1700 North Westwood Avenue
Toledo, Ohio 43607-I 207
Telephone: 419.534.3710
Fax: 419531.0465
www.eisc.org

20

November 24, 1998

FSIS Hearing Clerk
Food and Safety Inspection Service
U.S. Department of Agriculture
Room 109, Cotton Annex
300 12th Street, SW
Washington, DC 20250-3700

Re: Food Safety Initiative Strategic Plan Docket No. 98-045N

To Whom It May Concern:

The Center for Innovative Food Technology (CIFT) submits for public record the attached comments regarding the President's Council on Food Safety.

Sincerely,

Julian Gravino
President and CEO
EISC



Center for Innovative Food Technology

A Division of EISC

1700 North **Westwood** Avenue
Toledo, Ohio 43607-I 207
Telephone: 419.534.3710
Fax: 419.531.8465
www.eisc.org

Comments on the Vision Statement of the President's Federal Food Safety Plan USDA Docket No. 98-045N

The Center for Innovative Food Technology (CIFT), a non-profit organization located in Toledo, Ohio, was created to provide technical solutions to companies involved in the nation's largest and most economically significant industry, food processing; As a division of the Edison Industrial Systems Center, CIFT is supported by federal agencies, the private sector, by America's utilities, academia and by fees for service. Through the application of technology and deployment, CIFT's mission is to provide product and process development services and applied research leading to competitive advantage in the world marketplace.

CIFT works closely with The Ohio State University, General Mills, Nabisco, Nestle R&D Center, and Hunt-Wesson, Inc. to name a few of the larger corporations. However, most of CIFT's services are provided to the smaller food processors and producers. CIFT also has a long and successful history in working with federal food safety officials in the Cooperative Research Education and Extension Service.

CIFT is grateful for the opportunity to offer comments on the Council's vision statement and applauds the Clinton Administrations' efforts to develop a comprehensive strategic federal safety food plan. CIFT is in total agreement with the premise of the Vision statement, particularly with the assertion, "... Food is safe because everyone understands and accepts their responsibilities."

As an organization with a mission of the ultimate economic viability of small organizations, CIFT would suggest that the interests of the smaller processors need to be represented in the food safety system. The nation's research community is the best in the world, and will undoubtedly develop technology that will enhance overall safety. Likewise, our regulatory system is second to none in efficiency. However, if the resources of these organizations are not made available to the smaller contributors, which comprise over fifty percent to the food supply, overall national risk will not be sufficiently reduced. CIFT's comments, therefore, primarily address the need for deployment and implementation of safety-enhancing solutions to the industry.

CIFT believes the following should be included in the Council's final recommendation:

- While applauding the spread of science-based tools such as HACCP, efforts should be made to promote the use of such techniques on a "want to" rather than a "have to" basis. By educating and assisting industry in the development of such plans, and by integrating them into a Total Quality approach, the true potential of the tools can be easily reached.
- By establishing non-adversarial organizations with no regulatory authority, communication that will provide important data to the Agencies can be established thus enhancing the quality of the data collected and eliminating counterproductive controversy dealing with the depth of the problem.
- The system must be risk-based, and be able to distinguish between technical infractions and true threats to the public health.
- Education of the food preparation industry must be dramatically increased. The food safety system is only as strong as its weakest link and a goal must be to educate all involved of the potential public health ramifications of their actions as they perform their duties.
- Food processors at all levels must be made aware of current developments, both emerging threats, prevention and remediation techniques.
- Resources must be provided to the industry to assist in the implementation of safety enhancing solutions. In a competitive, low margin industry, smaller processors do not often have the resident expertise necessary to implement safety programs. Further, the corporate downsizing of recent years has left many national processors lacking in the internal resources necessary to devote to safety issues.
- Finally, in recognition of the fact that food safety enhancement will require a long-term effort, our educational institutions need to make long term commitments to food safety. Food science and food engineering curricula must be modified to incorporate education and training in applied food safety at both the baccalaureate and post-baccalaureate levels.

The nation's research community and regulatory system are the best in the world. However, much of the current food safety information or technology never reaches the small food processors and producers. Deployment and implementation to this industry is critical in ensuring the safety of the nation's food supply. CIFT is already playing a key role in implementation, education and deployment of safety enhancing solutions.